

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**AFFIDAVIT OF TIFFANY R. ELLIS IN  
SUPPORT OF PLAINTIFFS' LIST OF  
DISPUTED ENTRIES FOR SPECIAL  
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in  
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing  
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for  
6 Special Master Review on April 10, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for  
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs  
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries  
10 was challenged. The Brief included the general background of the privilege dispute process to  
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a  
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
14 April 10, 2025 contained entries still in dispute for custodian Danielle Sheridan, Frank Chang,  
15 and selective entries included on Plaintiffs' Attachment B to Plaintiffs' April 3, 2025 submission.

16 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on  
17 April 10, 2025 did not contain any entries for the custodians that overlapped with custodians  
18 already submitted to the Special Master for review.

19 **Bushra Faiz**

20 6. Defendants included approximately 255 entries for Bushra Faiz across its Tranche  
21 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

22 7. Plaintiffs originally challenged approximately 69 of these 255 entries.

23 8. As of January 31, 2025<sup>1</sup>, Defendants did not withdraw their claim of privilege to  
24 any entry in full or in part.

25 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log  
26 after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants

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28 <sup>1</sup> Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log  
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.  
*See* ECF No. 2357.

1 withdrew their claim of privilege to 22 entries in full and 20 entries in part.

2 10. Defendants provided Plaintiffs with a revised Privilege Log on April 16, 2025. In  
3 total, to date, Defendants logged 334 entries for Bushra Faiz and have withdrawn or will  
4 withdraw their claim of privilege to approximately 38 entries in full and 36 entries in part.

5 11. On March 25, 2025, Plaintiffs provided the Special Master and Defendants with a  
6 list of 29 entries still in dispute for Bushra Faiz following a review of Uber's revised privilege  
7 log that included updated or additional information provided by Uber, documents produced with  
8 redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' March 14,  
9 2025 privilege log.

10 12. On April 10, 2025, Plaintiffs provided the Special Master and Defendants with a  
11 supplemental list of 5 entries for Bushra Faiz from Defendants' April 1, 2025 and April 7, 2025  
12 privilege logs.

13 13. On April 15, 2025, Defendants provided written response to Plaintiffs' list and the  
14 parties met and conferred. During the meet and confer process, Defendants informed Plaintiffs  
15 that they withdrew their claim to 15 entries in full and 16 entries in part since the submission on  
16 March 25, 2025.

17 14. On April 15, 2025 Plaintiffs provided the Special Master and Defendants with a  
18 list of 7 entries that remain in dispute for Bushra Faiz. The list did include 4 entries that  
19 Defendants will produce redacted versions at a future date.

20 Executed this 18th day of April, 2025 in Detroit, Michigan.

21  
22 /s/ Tiffany R. Ellis  
23 Tiffany R. Ellis  
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